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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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Telebrands Corp.,	Civil Action No.
	10 Civ. 03730 (SRC)(MAS)
Plaintiff,	
v.	<b>[PROPOSED] ORDER GRANTING</b>
	<b>DEFENDANTS' MOTION TO SEAL</b>
	<b>MATERIALS</b>
Tee Vee Brands (USA) et al.,	
Defendants.	
-----X	

**WHEREAS**, parties to this case entered into a confidential settlement agreement (the "Agreement") in order to resolve this litigation on February 11, 2011;

**WHEREAS**, the following materials contain either documents or information garnered from such documents that have been designated as "confidential" by parties to this case:

- a. The letter of Richard S. Schurin to Honorable Stanley R. Chesler dated July 16, 2012, and that letter's attachments;

**WHEREAS**, Telebrands has alleged violations of the Agreement and requested possible reinstatement of this matter to the Court's active docket;

**WHEREAS**, the parties have been ordered to appear before Judge Chesler on July 20, 2012, to discuss the allegations raised by Telebrands;

**WHEREAS**, the parties have previously agreed and continue to agree that the terms of the Agreement must remain confidential;

**WHEREAS**, the Agreement contains proprietary and other sensitive business information that the parties' competitors in the marketplace could utilize such information to gain an unfair advantage to the detriment of the parties;

**WHEREAS**, there is significant public interest in promoting the settlement of disputes; and

**WHEREAS**, no less restrictive alternative is available to prevent the clearly defined and serious injury to the parties, and for good and sufficient cause having been shown:

**IT IS HEREBY ORDERED** that:

Defendants' motion to seal materials is granted and the listed documents shall be maintained under seal by the Clerk of the Court.

**SO ORDERED** that \_\_\_\_\_ day of \_\_\_\_\_ 2012.

\_\_\_\_\_  
Hon. Michael A. Shipp, U.S.M.J.